



# Air Resources Board



Matthew Rodriquez  
Secretary for  
Environmental Protection

Mary D. Nichols, Chair  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

Edmund G. Brown Jr.  
Governor

August 29, 2017



Meredith Kurpius, Ph.D.  
Associate Air Director  
Air Quality Analysis Office  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street, AIR-7  
San Francisco, California 94105

Dear Dr. Kurpius:

The California Air Resources Board requests that the U.S. Environmental Protection Agency (U.S. EPA) concur that the January 31, 2014 PM<sub>10</sub> exceedance at the Brawley monitoring site (Site No. 06-025-0007) in the Imperial County Air Pollution Control District be flagged as a natural event due to high winds. This value has implications on the PM<sub>10</sub> nonattainment designation of Imperial County. Documentation on this high wind event and its impact on air quality is enclosed.

Unusually high PM<sub>10</sub> concentrations were recorded at the Brawley monitoring site in the Imperial County Air Pollution Control District on January 31, 2014. Meteorological data showed a low pressure system moved through the area. Local airports reported sustained winds over 30 miles per hour (mph) along with gusts up to 40 mph in the hours preceding the high concentrations seen at the site. Analysis indicated that these strong winds entrained and transported dust from the large desert regions to the west of the monitor into the Imperial Valley. As this was not a scheduled monitoring day, only two Federal Equivalent Method (FEM) monitoring sites, Brawley and Niland, were operating, with only the Brawley site exceeding the federal PM<sub>10</sub> standard of 150  $\mu\text{g}/\text{m}^3$ . Analysis and data presented in the accompanying document show that without these high winds and entrained dust, the concentrations measured at the monitoring site on January 31, 2014 would have been below the federal standard.

On March 22, 2007, the U.S. EPA adopted the *Treatment of Data Influenced by Exceptional Events* rule that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (72 FR 13560). This rule, which was revised on October 3, 2016 (81 FR 68216), requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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If you have any questions regarding the enclosed documentation please contact Mr. Webster Tasat, Manager, Central Valley Air Quality Planning Section, at (916) 323-4950 or via email at [webster.tasat@arb.ca.gov](mailto:webster.tasat@arb.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Sylvia Vanderspek", with a long horizontal flourish extending to the right.

Sylvia Vanderspek, Chief  
Air Quality Planning Branch  
Air Quality Planning and Science Division

Enclosure

cc: Matt Dessert  
Air Pollution Control Officer  
Imperial County Air Pollution Control District  
150 South Ninth Street  
El Centro, California 92243-2850

Webster Tasat, Manager  
Central Valley Air Quality Planning Section  
Air Quality Planning and Science Division